

**FILED**

MAY 08 2019

**IN THE UNITED STATES DISTRICT COURT** Mark C. McCartt, Clerk  
**FOR THE NORTHERN DISTRICT OF OKLAHOMA** U.S. DISTRICT COURT

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**SEBASTIAN COBELO,**

**Defendant.**

Case No. 19 CR 88 JED

**INDICTMENT**

**[COUNT 1: 21 U.S.C. §§ 841(a)(1) and**

**841(b)(1)(A)(viii) – Possession of**

**Methamphetamine With Intent to**

**Distribute;**

**COUNT 2: 18 U.S.C. § 924(c)(1)(A)(i) –**

**Possession of a Firearm in Furtherance**

**of a Drug Trafficking Crime;**

**COUNT 3: 21 U.S.C. §§ 841(a)(1) and**

**841(b)(1)(B)(viii) – Possession of**

**Methamphetamine With Intent to**

**Distribute;**

**COUNT 4: 18 U.S.C. § 924(c)(1)(A)(i) –**

**Possession of Firearms in Furtherance**

**of a Drug Trafficking Crime;**

**Forfeiture Allegation: 21 U.S.C.**

**§ 853(a), 18 U.S.C. § 924(d) and 28**

**U.S.C. § 2461(c) – Drug and Firearm**

**Forfeiture]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]**

On or about October 22, 2018, in the Northern District of Oklahoma, the defendant, **SEBASTIAN COBELO**, did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

**COUNT TWO**  
**[18 U.S.C. § 924(c)(1)(A)(i)]**

On or about October 22, 2018, in the Northern District of Oklahoma, the defendant, **SEBASTIAN COBELO**, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession of Methamphetamine With Intent to Distribute, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT THREE**  
**[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]**

On or about October 14, 2018, in the Northern District of Oklahoma, the defendant, **SEBASTIAN COBELO**, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

**COUNT FOUR**  
**[18 U.S.C. § 924(c)(1)(A)(i)]**

On or about October 14, 2018, in the Northern District of Oklahoma, the defendant, **SEBASTIAN COBELO**, did knowingly possess firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession of Methamphetamine With Intent to Distribute, a violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**DRUG AND FIREARM FORFEITURE ALLEGATION**  
**[21 U.S.C. § 853(a), 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c)]**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a); Title 18, United States Code, Section 924(d); and Title 28, United States Code, Section 2461(c).

Upon conviction of any of the drug and firearm offenses alleged in Counts One through Four of this Indictment, as part of his sentence, the defendant, **SEBASTIAN COBELO**, shall forfeit to the United States the firearm, ammunition and currency involved in or used in the knowing commission of such drug and firearm offenses, and any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such drug and firearm offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such drug and firearm offenses, including, but not limited to:

**FIREARMS AND AMMUNITION**

1. Smith and Wesson, Model M&P Shield, .40 caliber semi-automatic pistol, serial number HUE4577;
2. Zastava, Model PAP M70, 7.62mmx39 caliber semi-automatic rifle, with magazine, serial number ZAP AP007253;
3. Glock, Model 23Gen4, .40 caliber semi-automatic pistol, serial number XPM581;
4. DPMS, Model AR 15, .223-5.56mm caliber semi-automatic rifle, serial number FH209338; and
5. Approximately 194 miscellaneous rounds of ammunition.

**CURRENCY**

1. \$4,578.53 in United States currency, seized from Defendant Cobelo on October 14, 2018; and
2. \$3062.00 in United States currency, seized from Defendant Cobelo on October 22, 2018.

All pursuant to Title 21, United States Code, Section 853(a); Title 18, United States Code, Section 924(d); and Title 28, United States Code, Section 2461(c).

R. TRENT SHORES  
UNITED STATES ATTORNEY

  
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MARK R. MORGAN  
Assistant United States Attorney

A TRUE BILL

*/s/ Grand Jury Foreperson*  
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Grand Jury Foreperson